

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**AIMEE BEVAN, as Personal Representative of the  
Estate of DESIREE GONZALES, deceased,**

**Plaintiff,**

**v.**

**Case 1:15-cv-00073-KG-SCY**

**SANTA FE COUNTY, MARK GALLEGOS, Deputy  
Warden/Acting Youth Development Administrator, in his  
official and individual capacities, GABRIEL VALENCIA,  
Youth Development Administrator, individually,  
MATTHEW EDMUNDS, Corrections Officer, individually,  
JOHN ORTEGA, Corrections Officer, individually,  
MOLLY ARCHULETA, Corrections Nurse, individually,  
ST. VINCENT HOSPITAL, and  
NATHAN PAUL UNKEFER, M.D.,**

**Defendants.**

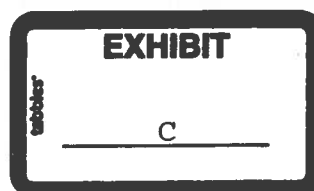
**PLAINTIFF'S RESPONSE TO DEFENDANT NATHAN PAUL UNKEFER, M.D.'S  
FIRST SET OF INTERROGATORIES TO PLAINTIFF AIMEE BEVAN**

**INTERROGATORIES**

**INTERROGATORY NO. 1:** For those individuals whom Plaintiff contends are entitled to receive all or a portion of any proceeds of any judgment entered in this matter pursuant to the New Mexico Wrongful Death Act, please identify and provide for each: their full name, driver's license number, date of birth, current address, and list any other names they have ever gone by during their lifetimes with the dates each name was used.

**ANSWER:**

**Plaintiff objects to this interrogatory. Distribution of proceeds is not relevant to any issue at trial and would not lead to admissible evidence. Without waiving the objection, Plaintiff will answer the question. The New Mexico Wrongful Death Act states that for a**



**INTERROGATORY NO. 12:** Itemize any and all other losses or expenses, not otherwise set forth in your answers to the Interrogatories above, that you allege are causally related to your allegations against Nathan Paul Unkefer, M.D.

**ANSWER:**

See M. Brian McDonald, Ph.D. report.

**INTERROGATORY NO. 13:** State the name, address and telephone number of each person you may call as a witness at the time of trial. As to each such person, state the subject matter on which the witness is expected to testify.

**ANSWER:**

It is not yet known who may be called to testify at trial. The following may be called as witnesses:

**Robert Henry, M.D.**  
5 Satellite Court  
Tijeras, NM 87059

**Michael D. Cohen, M.D.**  
160 Spring Street  
Saratoga Springs, NY 12866

**Don C. Fisher, M.D., M.S.**  
5600 Wyoming Blvd., NE, Suite 210-B  
Albuquerque, NM 87109

**Andrea Weisman, Ph.D.**  
Juvenile and Correctional Mental Health Consultant  
DOJ Certified PREA Auditor  
3920 Livingston Street, N.W.  
Washington, DC 20015

**M. Brian McDonald, Ph.D.**  
4219 Coe Drive, N.E.  
Albuquerque, NM 87110

**Sam Andrews, M.D.**  
Office of Medical Investigators  
1 University of New Mexico  
Albuquerque, NM 87131

**Terasa L. Prock, M.D.**  
455 St. Michaels Dr.  
Santa Fe, NM 87505

**Meher S. Best, M.D.**  
c/o Hari-Amrit Khalsa, Esq.  
Keleher & McLeod, P.A.  
P.O. Box AA  
Albuquerque, NM 87103  
or  
455 S. Michaels Dr.  
Santa Fe, NM 87505

**INTERROGATORY NO. 14:** State the name, address, and telephone number of any person, other than those persons mentioned in your answers to the preceding Interrogatories, whom you believe has, or purports to have, any knowledge or information relative to the subject matter of this lawsuit and state briefly the nature of their knowledge or information.

**ANSWER:**

**None other than disclosures submitted by all parties.**

**INTERROGATORY NO. 15:** Please state whether Desiree Gonzales was a Medicare or Medicaid beneficiary or received Medicare or Medicaid benefits in connection with any treatment she received related to the claims in the Complaint.

**ANSWER:**

**Yes.**

**VERIFICATION**

STATE OF NEW MEXICO     )  
  )ss.  
COUNTY OF SANTA FE     )

I, Aimee Bevan, being duly sworn, state upon oath that I have read Plaintiff's answers to Defendant Nathan Paul Unkefer, M.D.'s First Set of Interrogatories to Plaintiff Aimee Bevan and the same are true and correct to the best of my knowledge and belief.

Aimee Bevan  
Aimee Bevan

SUBSCRIBED AND SWORN TO before me this 7<sup>th</sup> day of October, 2015 by  
Aimee Bevan.

Veronica L. Dale  
NOTARY PUBLIC

My Commission Expires:

October 30, 2018

